

REMARKS

In accordance with the foregoing, the specification and claims have been amended to better clarify the invention and distinguish same over the art of record. In addition, substitute Figures 9-11 have been submitted, to include --PRIOR ART-- labels responsive to the requirement of the Examiner.

STATUS OF CLAIMS

All of the pending claims 1-8 are rejected.

The rejections are respectfully traversed.

ITEM 4: REJECTION OF CLAIM 1 FOR ANTICIPATION OF UNDER 35 U.S.C. 102 (E) BY USP 6,297,788 TO SHIGETA.

The invention defined in claim 1 includes structural elements that are not described in Shigeta (USP 6,297,788) and produces an effect that cannot be obtained by Shigeta's invention. The rejection therefore is respectfully traversed.

According to the invention defined in claim 1, a superposition method is applied only to a specific area within a frame that is an image to be displayed and the superposition method is not applied to the entire frame. Nothing in Shigeta discloses or suggests this subject matter.

Shigeta's invention is directed to improving a superposition method; however, Shigeta's invention is based on the premise that the superposition method is applied to the entire frame. By contrast, the invention defined in claim 1 is the result achieved from finding a problem of drive based on the premise mentioned above, as described in page 3, line 25-page 4, line 10. According to the invention defined in claim 1, pseudo contours in a specific area and a check pattern noise in an area other than the specific area are reduced and display quality of the entire frame is enhanced.

Moreover, while Applicants have responded to the rejection with reference to claim 1, the foregoing features and distinctions apply to the invention as defined all pending claims of the application.

ITEM 6: REJECTION OF CLAIMS 2-8 FOR OBVIOUSNESS UNDER 35 U.S.C. 103 (A) OVER SHIGETA AND MIKOSHIBA ET AL. (USP 6,529,204).

Applicants respectfully traverse the rejection and assert that the inventions as defined by claims 2-8 are not obvious over the combination of the prior art relied upon.

The subject matter of claim 2 is that a specific area to which a superposition method is applied is determined subject to a gradation, a luminance gradient between neighboring pixels and a size of an area. This feature relates to limiting, and thereby avoiding excessive application of, the superposition method.

Shigeta fails to describe that a specific area is limited to an area larger than a predetermined value and likewise fails to describe that application of the superposition method is limited only to a specific area. According to the disclosure by Shigeta, if a frame is an image where gradation levels of all pixels have the specific gradation level, i.e., density is uniform, even though no pseudo contours occur in this case, mixing of different subframe expressions is found in the entire frame. This is because that the entire frame is always the target for application of the superposition method.

Mikoshiba merely describes a desirable embodiment of Mikoshiba's invention, in a display of a still image at col.19, lines 43-49. There is no description relating to a superposition method in Mikoshiba. Mikoshiba teaches that false contours are reduced using a method totally different from the superposition method.

According to Mikoshiba's method, prior to display, a position of and an amount by which false contours occur in a frame are presumed by calculations and an original signal of an image is corrected, so that false contours are prevented. In order to carry out the method of Mikoshiba, a complicated arithmetic circuit is required for precisely calculating a position of and an amount that false contours occur.

Such an arithmetic circuit as is required by Mikoshiba is unnecessary in the practice of the present invention, in which pseudo contours are prevented by the superposition method. A concept that a superposition method is applied to a specific area where pseudo contours will occur in a frame and is not applied to the other areas can be obtained from neither Shigeta nor Mikoshiba and is not obvious in view thereof, whether taken singularly or in any proper combination.

Applicants further, respectfully submit that *prima facie* obviousness of the combination of Shigeta and Mikoshiba et al. has not been shown and is not rendered obvious by the conclusory comment of the Examiner in the sentence of the action at page 4, lines 1-3. Applicants respectfully submit that the contention of "common knowledge" impliedly relied upon is uniformly rejected by the U.S. PTO as failing to establish *prima facie* obviousness in accordance with the Kunin Memorandum of February 21, 2002, copy enclosed.

CONCLUSION

It is respectfully submitted that the pending claims patentable distinguish over the art of record and, there being no other objections or rejections, that the application is in condition for allowance which action is earnestly solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: February 17, 2004

By: _____

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Date 2/17/04